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UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

IN RE:	§	CASE NO. 09-20338-C
	§	
JOHN A. GARCIA AND	§	
DESIREE GARCIA	§	
	§	
	§	CHAPTER 13
DEBTORS	§	

**RESPONSE TO MOTION FOR RELIEF FROM STAY**  
**REGARDING EXEMPT PROPERTY FILED BAC HOME LOANS SERVICING, LP**  
**AND REQUEST FOR A HEARING**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

NOW COMES John A. Garcia and Desiree Garcia, Debtors in the above-captioned bankruptcy proceeding, and files this Response to the Motion for Relief From Stay Regarding Exempt Property (the "Motion") filed by Ford Motor Credit Company, and shows the following:

1. The Debtors are unable to either admit or deny the allegations contained in paragraph 1 of the Motion.
2. The Debtors are unable to either admit or deny the allegations contained in paragraph 2 of the Motion.
3. The Debtors are unable to either admit or deny the allegations contained in paragraph 3 of the Motion.
4. The Debtors admit the allegations contained in paragraph 4 of the Motion.

5. The Debtors admit the allegations contained in paragraph 5 of the Motion.
6. The Debtors deny the allegations contained in paragraph 6 of the Motion.
7. The Debtors deny the allegations contained in paragraph 7 of the Motion.
8. The Debtors deny the allegations in paragraph 8 of the Motion.
9. The Debtors deny the allegations in paragraph 9 of the Motion.
10. The Debtors are unable to admit or deny the allegations in paragraph 10 of the Motion.
11. The Debtors are unable to admit or deny the allegations in paragraph 11 of the Motion.
12. The Debtors are unable to admit or deny the allegations in paragraph 12 of the Motion.
13. The Debtors are unable to admit or deny the allegations in paragraph 13 of the Motion
14. The Debtors deny the allegations contained in paragraph 14 of the Motion.
15. The Debtors are unable to admit or deny the allegations contained in paragraph 15 of the Motion.
16. The allegations contained in paragraph 16 of the Motion are not applicable.
17. The Debtors deny the allegations in paragraph in paragraph 17 of the Motion.
18. The Debtors admit the allegations in paragraph 18 of the Motion.

For the foregoing reasons, the Debtors requests that the Court deny the relief requested and for such further relief, at law and in equity, to which Debtors may show themselves to be justly entitled.

Respectfully submitted,

/S/ William A. Whittle

William A. Whittle

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ATTORNEY FOR DEBTORS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was served on the Debtors, the U.S. Trustee and the Chapter 13 Trustee and on the parties set forth below by electronic mail (if applicable) or by First Class United States Mail, postage prepaid, on this the 13th day of May, 2010

Yvonne Knesek-Foltz  
610 West 5<sup>th</sup> Street Suite 602  
Austin, TX 78701

/S/ William A. Whittle  
William A. Whittle